

Appendix C – Response to Public Scoping Comments

Commenter	Comment Summary	Response to Comment
1 Jeff Anderson	The project would result in more choices for the valley residents and could result in lower prices and more reliable services.	Comment noted. Comment doesn't raise any issues that require analysis in the EA.
2 Town of Castle Valley	The town suffers from substandard internet and lack of cell phone communication. In November 2014 the town lost 911 services for a day. The communication site could possibly provide a 911 backup to the current provider and is something the community strongly supports.	This information has been added to section 1.2 of the EA.
3 Pam Hackley	Assess the potential effects of electrical or electromagnetic fields generated by the tower on plants including trees, animals including bees and humans.	The BLM is not the regulatory authority that provides oversight for radio frequency exposure. This is addressed in the Issues Considered but Eliminated from Further Analysis section 1.8.
4 Pam Hackley	Will there be other equipment installed by the applicant or private land owners/subscribers that may emit radiation? If so, please evaluate any potential effects as noted above.	This information has been added to the EA in section 2.2. See comment #3.
5 Pam Hackley	Ensure there are no nesting raptors including owls along the route or proposed tower/facilities site; if noted please set a timing restriction for construction activities to ensure nest(s) success.	Additional information has been added to the EA regarding nesting raptor surveys and timing restrictions for construction activities in section 2.2.
6 Pam Hackley	Ensure appropriate surveys are done for Jones cycladenia a Federally list threatened species known to occur in the area.	Jones Cycladenia habitat is not present in the project area. See IDT checklist, Appendix B.
7	Salvage plants in the areas to be disturbed including tower site and ROW access. Use	Additional information has been

Pam Hackley	native seed and salvaged plants to rebailitate bare ground following disturbance.	added to the EA in section 2.2.
8 Pam Heckley	Conduct noxious weed survey. Diffuse knapweed is known in the valley. Much time, effort and money has been spent by the Town of Castle Valley and other agencies trying to contain/control it. Ensure vehicles and equipment are adequately cleaned so they do not become weed seed vectors.	A survey for noxious weeds was completed. No noxious weeds were found within the proposed project area. Due to the low impact nature of the proposed project the likelihood of noxious/invasive plants becoming established on the site is low. If approved the ROW would be monitored for weeds. See the IDT Checklist, Appendix B.
9 Pam Hackley	Is there a potential fire hazard associated with the tower and/or facilities – eg batteries?	Additional information has been added to the EA in section 2.2.
10 Pam Hackley	If night lighting is required at the site, please ensure that it does not affect the dark skies character of the valley and not visible directly from any dwelling.	Night lighting would not be required at the site. See section 2.2 of the EA.
11 KC Jones	Improved wideband Internet service is needed in Castle Valley. In addition, the “competition” will provide incentive Frontier to improve their service.	Comment noted. The comment does not raise issues that require analysis in the EA.
12 KC Jones	I own property in Colorado served by a similar system and the service is good with high reliability.	Comment noted. The comment does not raise issues that require analysis in the EA..
13 KC Jones	If the small tower is guyed, what can be done to protect the wildlife at night or will the entire site be fenced?	The tower would not be guyed. Additional information has been added in section 2.2 of the EA.
14 KC Jones	The proposed site readily accessible which will permit much faster repairs and with less impact than would be the case in a more remote area.	Comment noted. The comment does not raise issues that require analysis in the EA..

15 KC Jones	Environmentally, the only real concern appears to be the possibility of a battery leak. That concern can be minimized through the choice of battery and the use of good battery trays or boxes to contain leaks.	Additional information has been added in section 2.2 of the EA.
16 KC Jones	Mounting the panels as low as practicable will minimize visibility of the site and help protect the panels from the sometimes extreme winds. Consider vegetation to shield the site. The “viewscape” is very important in Castle Valley.	Additional information has been added to the proposed action in section 2.2. Visual Resources are analyzed in section 3.3.1 of the EA.
17 Castle Valley Fire Department	The proposed tower will provide numerous benefits, namely, increased public safety and welfare by providing access to the 911 system when the power and telephone services go down in our area.	See comment #2.
18 Ronald W. Drake	I fully support the proposed communication site near Castle Valley. No concern regarding intrusion on the public land. It will be a tremendous asset to the Community of Castle Valley to be able to receive reliable and superior internet service.	Comment noted. The comment does not raise issues that require analysis in the EA..
19 Jason Graham	The Castle Valley communication site will potentially provide a much faster and better internet service to a lot of residences in Castle Valley. It making a negative impact on the valley seems extremely minimal and the equipment being used will be a small 15ft tower and equipment that will not be an “eye sore” or obstruct any views. This sounds like it could be very beneficial for the town of CV and provide a necessary upgrade for Internet in the valley.	Comment noted. The comment does not raise issues that require analysis in the EA..

20 Joan Harvey	I support the installation of internet equipment in Castle Valley. I own a house not far up the valley from the proposed internet equipment set-up and I support the project. It appears to be minimally invasive and with solar panels to be environmentally conscious. While in general I object to disturbance of any kind on public land, in this case I believe the service provided to the residents of the valley outweigh concerns about unsightliness or disturbance to the land.	Comment noted. The comment does not raise issues that require analysis in the EA..
21 Gary Duncan	No specifications of frequency, wave forms, radiation powers, directional or non-directional broadcast are content in this application. Before any accurate search and presentation of advisability based on evidence can be included here for obvious concerns and considerations, this information must be in place.	Additional information has been added in section 2.2 and Appendix D of the EA.
22 Gary Duncan	The Castle Valley Corridor is and has long been resident to numerous persons informed regarding wireless radiation impacts, wishing to avoid these impacts (hence selecting this area for location because of the absence of these radiation forms) and also persona of moderate to severe electrosensitization conditions and severely needing these protections...assumedly all these are in danger of compromise with this installation. Prodigious academic study indicates impacts of such installations including: wildlife abandonment areas, bee colony collapse disorder related to wireless radiation, learning and memory impairment linked with wireless proliferation, generalized health deterioration and many psychological disorders and impacts. Not being familiar	See comment #3.

	<p>with submission protocol in these BLM proceedings, and in order not to submit voluminous evidence substantiating these concerns, however finding it appropriate to cite at least the principles, I direct those interested and responsible to the BioInnitiative Report:</p> <p>www.bioiniative.org...which for starters categorizes 1800 peer reviewed professional medical journal research reported in these documentations, all screened not to have any industry contribution or control of research.</p>	
<p>23</p> <p>Gary Duncan</p>	<p>It is consensus among the independent and informed, especially the rapidly growing Electro Sensitization Community that the solution to faster, higher quality, hacker protected and biologically safe communication infrastructure lies in mandates of buried fiber optic infrastructure requiring hardwired connectivity. Industry will balk at this, as they did with public sanitation and tuberculosis impairment eras in our past due, exactly as the electrosensitization epidemic now is...to the Diseases of Civilization. However, prudence, investigation and health costs mandated the advisability of increased infrastructure costs in order to secure public health and biological welfare. It is my hope and that of a vast number of others unfortunately impacted in an inadvisable and basically industry overrun deployment of wireless cheap connectivity that requirements of saner and safer technologies will come from the government we fund and depend on to protect us.</p>	<p>See Comment #3.</p>
<p>24</p>	<p>What are the electrical power and</p>	<p>See comments #3 and 21.</p>

Robert Lippman	radiological specifications for the proposed tower and dish? The Environmental Assessment should address and cite all studies and standards regarding such microwave tower emissions and any potential impacts on human and biological health (human, animal bees, and pollinators, etc.). Note that there are nearby residences, and that the area is used by hikers and mountain bikers who may be exposed to radiation.	
25 Robert Lippman	Applicant should supply a map and other documentation showing the “coverage area” microwave emission radius/pattern and power/emissions levels. Given the concern BLM should address and require any warranted mitigation strategies such as radiation shielding.	Additional information has been added in section 2.2 and Appendix D of the EA. See comment #3.
26 Robert Lippman	Will additional “sub-stations” or emitting wi-fi antennas be required to deliver signals to subscribers?	Additional information has been added in section 2.2 of the EA.
27 Robert Lippman	Is this project a forerunner for a potential cellular tower or capability in Castle Valley?	This comment is outside of the scope of the project. This EA analyzes the effects of the Proposed Action submitted by Royce’s Electronics in their application for a ROW. A cellular tower is not part of the proposed action.
28 Robert Lippman	I am requesting a public hearing and formal comment period on the draft EA.	The town of Castle of Valley held a public hearing at the request of the commenter. There will be a 15 day public comment period for the draft EA.

<p>29</p> <p>Robert Lippman</p>	<p>Numerous and growing sources, including governments, NGO's and scientific and medical panels recommend, and indeed insist upon, the preference of wired technology over wireless transmissions [in both high power (cellular) and allegedly low power (broadband wifi) contexts] for the following, well-documented reasons:</p> <p>-Pulsed radio and microwave frequencies of wireless/broadband technologies are classified by the World Health Organization as a Class 2B human carcinogen (despite tremendous pressure from industry against such disclosure), and FCC "guidelines" for RF exposure have been critiqued by scientists and health professionals as woefully inadequate and ineffective (a result of "successful" industry pressure and influence);</p> <p>-Medical and health professionals and scientists from epidemiological researchers, integrative medical practitioners and holistic physicians, to quantum- and bio-physicists, to psychologists, spiritual teachers and healers, among many other fields, have long recognized and understood that the human body is a bioelectric system and functions by electromagnetic signals and interactions at neurological, glandular, cellular, and DNA levels of activity and communication, and that radiation, including RF/microwave, disrupts these signals and healthy physiological (and emotional/mental) functions, leading to dysfunction, illness, disease and cancers;</p> <p>-Wireless technology emits electromagnetic waves and fields that disrupt bioelectric, intercellular communication, are shown to be neurotoxic, genotoxic (DNA-damaging) and carcinogenic, and cause what is now termed and recognized as general RF Sickness. RF/microwave radiation from now-common sources (from high-power cell towers to</p>	<p>These comments are outside of the scope of the project. This EA analyzes the effects of the Proposed Action submitted by Royce's Electronics. Wired infrastructure and fiber optics are not part of the proposed action.</p> <p>See comment #3.</p>
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	<p>“low-power” wifi and devices) is clearly linked to a broad spectrum of disease conditions including cardiac impairment and heart disease, stroke, Alzheimer’s, ADHD, multiple sclerosis, neurotoxicity, reproductive and fetal damage, cell membrane leakage, headaches, sleep disorders, dizziness, chronic fatigue, depression and irritability, tinnitus and hearing issues, acoustic neuroma, visual perturbations, cognitive and memory impairment, free-radical damage, immune failure, asthma and sinusitis, joint and muscular pain, and ultimately, many forms of cancer and lymphoma, to name but a few. Children are especially susceptible to cellular disruption from RF/microwave radiation. Again, these observations and effects apply to both high power and low power facilities, even including home routers, “smart-meters,” and other wireless devices. [see citations at end];</p> <p>-The Bioinitiative Working Group reports in its 2012 update to the 2007 Bioinitiative Report, that “the levels at which effects are reported to occur is lower by hundreds of times in comparison to 2007. The range of possible health effects that are adverse with chronic exposures has broadened.” [see citation];</p> <p>-“Cancer clusters” have been identified around, and linked to high-density wireless emissions, especially adjacent to facilities such as rooftop towers and repeaters;</p> <p>-A rapidly growing number of people are now being recognized as “electro-sensitive,” exhibiting moderate to severe symptoms of RF sickness well before signs of cancers and other physiological disruptions/diseases are identified;</p> <p>-Environmental and other biological damage</p>	
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	<p>to birds and bees (navigational disruption), wildlife, trees (browning and death) and plants has also been documented and linked to wireless emissions;</p> <p>-Monitoring studies indicate that RF emissions and wifi radiation are more powerful than producers/manufacturers of wireless devices maintain and report;</p> <p>I thus strongly urge the council to simply slow down this well-intended but incomplete problem-solving process and the rush to embrace and implement a “convenient” wireless technological “solution” or Pandora’s Tower, that may very well cause many more serious long-term problems and hazards than just slow internet, or turn a mere inconvenience into a crisis. The data and studies emerging over time demand serious circumspection as they clearly indicate that wireless technology, far from being invisible and benign, is a significant factor, and provides yet another inconvenient truth, in what Dr. Milham terms the emergence of “diseases of civilization.”</p> <p>As part of an independent and unbiased, full-spectrum review of this issue, the council should embrace the Precautionary Principle in its deliberations regarding the best, broadest, long-term interests of Castle Valley, and should be wary of accepting hearsay, assumptions or biased industry data without independent, scientific verification.</p> <p>I would thus recommend that the council rescind its “letter of support” and alternatively submit a request to the BLM to undertake a full environmental review, with the benefit of a public hearing and a full assessment of reasonable alternatives to the proposed project, as required by the spirit and letter of legislative intent and regulatory law under NEPA, in order to foster more</p>	
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	<p>public involvement and informed, best decision-making. Any less of a response would be per se irresponsible in light of the precautionary principle and notions of good governance, considering the body of scientific evidence and literature amassed, and the implications of such.</p> <p>Lastly, I would venture to add that most (if not all) residents who have chosen to live in Castle Valley appreciate its rural qualities and value the healthful environment and slower pace of life offered here, as a clear alternative to living in an impactful and stressful urban, electrified context.</p> <p>With careful, informed and conscious planning, we can have so-called benefits of modern life without succumbing to the cumulative impacts or short-sighted, slippery slope of such conveniences.</p> <p>-The governments of Switzerland, France, Germany, Russia, and Israel, and the Council of Europe have officially cautioned against wireless technology, recommending wired infrastructure and fiber optics as a safe and more secure alternative;</p> <p>-Wired infrastructures, especially fiber optics, are not only safe, but are much more reliable, effective, fast, energy efficient, and secure from hacking.</p> <p>Before involuntarily subjecting all residents (without consent; a growing civil rights issue in itself) and the local environment (bees, birds, wildlife, trees and plants) to the documented and potential impacts and hazards of 24-hour RF radiation and manipulated energy fields from wireless broadband, it behooves both the Castle Valley council as well as the BLM and other relevant regulatory agencies to take the time and effort to responsibly and fully investigate</p>	
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	<p>all the data and studies regarding health and environmental safety, and to assess <u>all</u> options and alternatives for improving internet capacity, including but not limited to:</p> <ul style="list-style-type: none"> -Putting a hold on the present proposal pending an agency and independent study (without sole reliance on industry data) surveying the existing studies and demographic mapping of wireless RF radiation impacts, and identifying all potential alternatives to wireless technology in order to better solve Castle Valley's communication issues in the best, long-term interests of all residents' health and safety, and the environment; -Pressuring Frontier through the legal and regulatory processes to upgrade and deliver the service we are all paying for (3 to 6 meg's of capacity), through the existing or upgraded infrastructure; -Upgrading existing infrastructure to fiber optics to better prepare for long-term needs, reliability, efficiency, security and safety; and to access community grant programs for broadband development funding; -Assessing the true viability of piggy-backing a broadband signal through existing infrastructure and lines (such as Emery Telecom vis-à-vis Frontier), whether sourced from a central infrastructure (wired) hub or from an "appropriately-placed" receiving tower that will not expose the general public and local environment to potentially harmful emissions [and the use of radiation remediation strategies (shielding, etc.) to mitigate emissions from such]; 	
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	<p>wireless technology, recommending wired infrastructure and fiber optics as a safe and more secure alternative;</p> <p>-Wired infrastructures, especially fiber optics, are not only safe, but are much more reliable, effective, fast, energy efficient, and secure from hacking.</p> <p>Before involuntarily subjecting all residents (without consent; a growing civil rights issue in itself) and the local environment (bees, birds, wildlife, trees and plants) to the documented and potential impacts and hazards of 24-hour RF radiation and manipulated energy fields from wireless broadband, it behooves both the Castle Valley council as well as the BLM and other relevant regulatory agencies to take the time and effort to responsibly and fully investigate all the data and studies regarding health and environmental safety, and to assess <u>all</u> options and alternatives for improving internet capacity, including but not limited to:</p> <p>-Putting a hold on the present proposal pending an agency and independent study (without sole reliance on industry data) surveying the existing studies and demographic mapping of wireless RF radiation impacts, and identifying all potential alternatives to wireless technology in order to better solve Castle Valley's communication issues in the best, long-term interests of all residents' health and safety, and the environment;</p> <p>-Pressuring Frontier through the legal and regulatory processes to upgrade and deliver the service we are all paying for (3 to 6 meg's of capacity), through the existing or upgraded infrastructure;</p> <p>-Upgrading existing infrastructure to fiber</p>	
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	<p>optics to better prepare for long-term needs, reliability, efficiency, security and safety; and to access community grant programs for broadband development funding;</p> <p>-Assessing the true viability of piggy-backing a broadband signal through existing infrastructure and lines (such as Emery Telecom vis-à-vis Frontier), whether sourced from a central infrastructure (wired) hub or from an “appropriately-placed” receiving tower that will not expose the general public and local environment to potentially harmful emissions [and the use of radiation remediation strategies (shielding, etc.) to mitigate emissions from such];</p>	
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